

5090
Ser 1832.2/L5216
28 Aug 1995

Mr. Cyrus Shabahari
State of California Environmental Protection Agency
Department of Toxic Substances Control
Region 2
700 Heinz Ave. Suite 200
Berkeley, CA 94710-2737

**Subject: IDENTIFICATION OF STATE APPLICABLE OR RELEVANT AND
APPROPRIATE REQUIREMENTS FOR THE FOUR PROPOSED REMOVAL
ACTIONS AT HUNTERS POINT ANNEX, SAN FRANCISCO, CALIFORNIA**

Dear Mr. Shabahari:

To expedite cleanup and reuse, the Department of the Navy (Navy) is planning four non-time-critical removal actions at Hunters Point Annex (HPA), San Francisco, California. Brief descriptions of the four projects follow, and the proposed locations are shown on the enclosed figures.

- (1) **Storm Drain System.** Site inspection (SI) results indicate that storm drain sediments in Parcels B, C, D, and E are contaminated with fuels and organic and inorganic compounds; storm drain integrity is poor in several locations; and tidal flap gates are inoperable, potentially allowing sediments to move out of the storm drain system with tidal changes. The objectives of this removal action are to reduce the possibility of contaminant migration and remove contaminated sediment.
- (2) **Soils and Floating Product in Parcel E.** Investigations in Parcel E identified hot spots of soil contaminated with organic and inorganic compounds, occupying approximately 15 acres of mostly unpaved land. The area considered under this removal action includes only site IR-3, the oil reclamation ponds. The oil reclamation ponds, which were unlined, were used for disposal of waste oil. The two ponds covered approximately 43,603 square feet, were about 5 feet deep, and were subsequently backfilled. A 2-foot-thick layer of floating product was identified during an investigation of the area. The objective of this removal action is to reduce the potential for contaminant transport to San Francisco Bay by either removing and disposing of contaminated soil and floating product or by applying bioremediation or chemical/thermal treatment of the soil and floating product.
- (3) **Groundwater Plumes in Parcels B, C, and E.** Groundwater at HPA generally flows south to east and away from the highlands, toward San Francisco Bay, except in Parcel E. The vertical gradient between the aquifers is upward. Contaminated groundwater plumes in Parcels B, C, and E have been identified and delineated. The plume posing the greatest threat to the bay in each parcel was selected for this removal action. The contaminants of primary concern include

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volatile organic compounds (VOC), polychlorinated biphenyls (PCB), and total petroleum hydrocarbons (TPH) for the Parcel B plume; VOCs, semivolatile organic compounds (SVOC), heavy metals, and TPH for the Parcel C plume; and VOCs, SVOCs, PCBs, and TPH for the Parcel E plume. Contamination is generally limited to the artificial fill, but has been found in the undifferentiated upper sands and the top several feet of bay mud in limited areas. The objective of this removal action is to reduce the risk to San Francisco Bay by containing or removing potential sources of contamination (groundwater plumes).

- (4) **Exploratory Excavations.** During SIs, 34 areas of stained soil were identified across HPA. Contaminants of concern include fuels, PCBs, cyanide, and organic and inorganic compounds. The objective of this removal action is to remove the exposure pathways from surface contaminants.

Because the removal actions are still in the planning phase, the Navy is requesting that the state identify only location-specific and chemical-specific applicable or relevant and appropriate requirements (ARARs) for the four removal actions. As the preferred alternative for each removal action is determined, the Navy will request action-specific ARARs.

To ensure timely and complete ARARs identification, please include the following information in your response:

1. A citation to the statutory or regulatory provision(s) for the potential state ARAR and the date of enactment or promulgation.
2. A brief description of why the potential state ARAR is applicable or relevant and appropriate.
3. If DTSC regards its proposed ARAR as more stringent than the corresponding Federal ARAR, the rationale and technical justification for using the more stringent ARAR.
4. A verbal request of data required, if DTSC needs more information to fully respond to this request.

The Navy requests a response within 30 calendar days of receipt of this request. If time permits, upon receipt of your response, the Navy project team would like to meet and discuss your proposed ARARs prior to finalizing each engineering evaluation/cost analysis for the four removal actions.

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Please direct any questions that you may have concerning this request to the undersigned at
(415) 244-2655.

~~Original~~ signed by:

RICHARD E. POWELL
By direction of
the Commanding Officer

Encl: (1) Removal Actions Locations diagrams (4 pages)

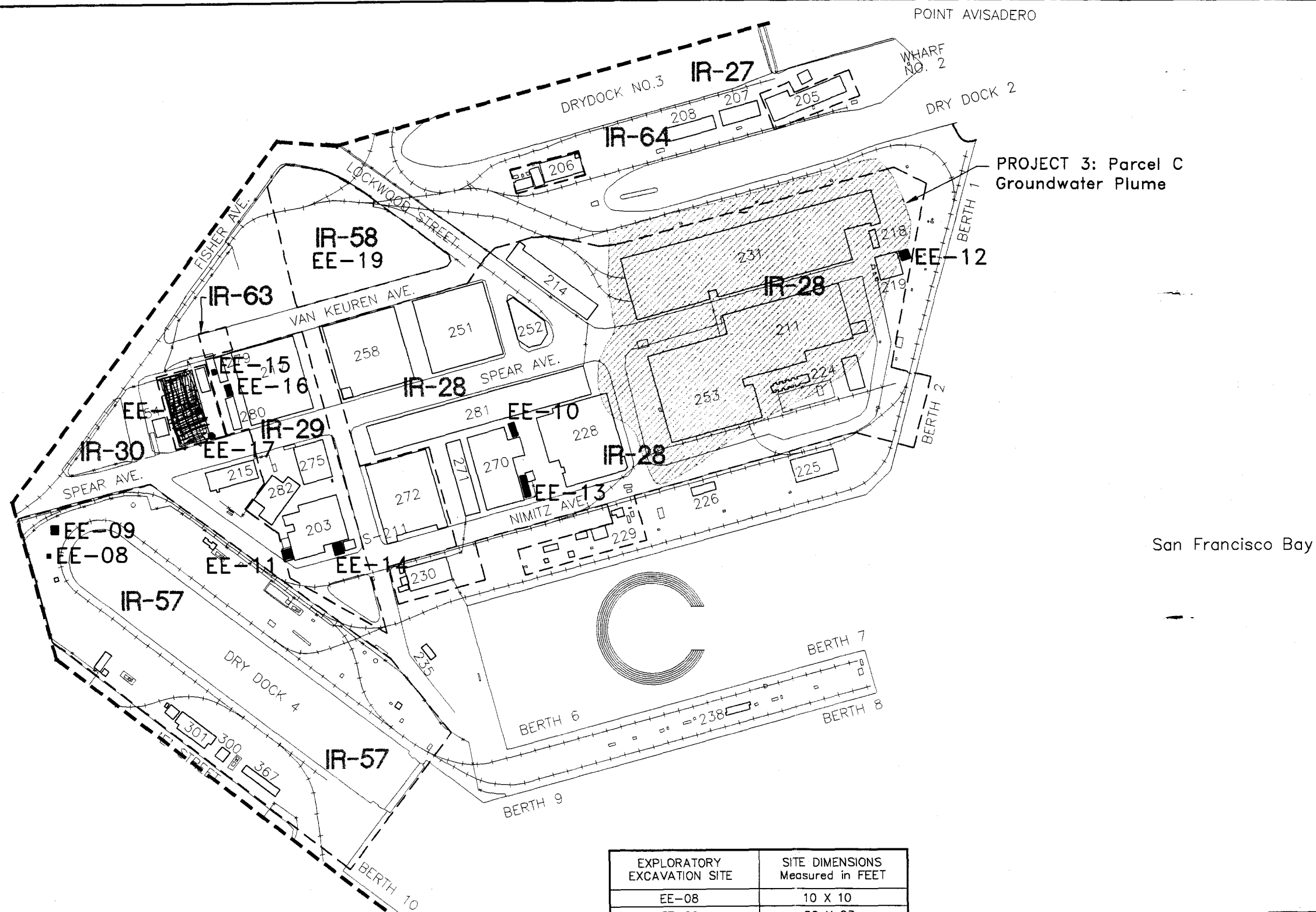
Copy to (w/ enclosure):

U.S. Environmental Protection Agency (Attn: Claire Trombadore)
U.S. Environmental Protection Agency (Attn: Sheryl Lauth)
Roy F. Weston (Attn: Karla Brasaemle)
California Regional Water Quality Control Board (Attn: Richard Hiett)
PRC Environmental Management (Attn: Mr. James Sickles)
Harding Lawson Associates (Attn: Mr. David Leland)

Blind Copy to (w/ enclosure):

62.3, 1832, 1832.1, 1832.2, 1832.3, 09CJC, 09CMN
Admin Records (3 Copies, w/encl)
Chron, blue, pink, green
Activity File: HPA (File: L5216DS.DOC) ab

IMU(SF)044-0287007-C.DWG - 05/10/95 - PS - 1-1 - REV001



Legend

- IR / SI SITES
- APPROXIMATE GROUNDWATER CONTAMINATION PLUME
- PARCEL BOUNDARY
- EE-01 EXPLORATORY EXCAVATION SITE
- FACILITY BOUNDARY

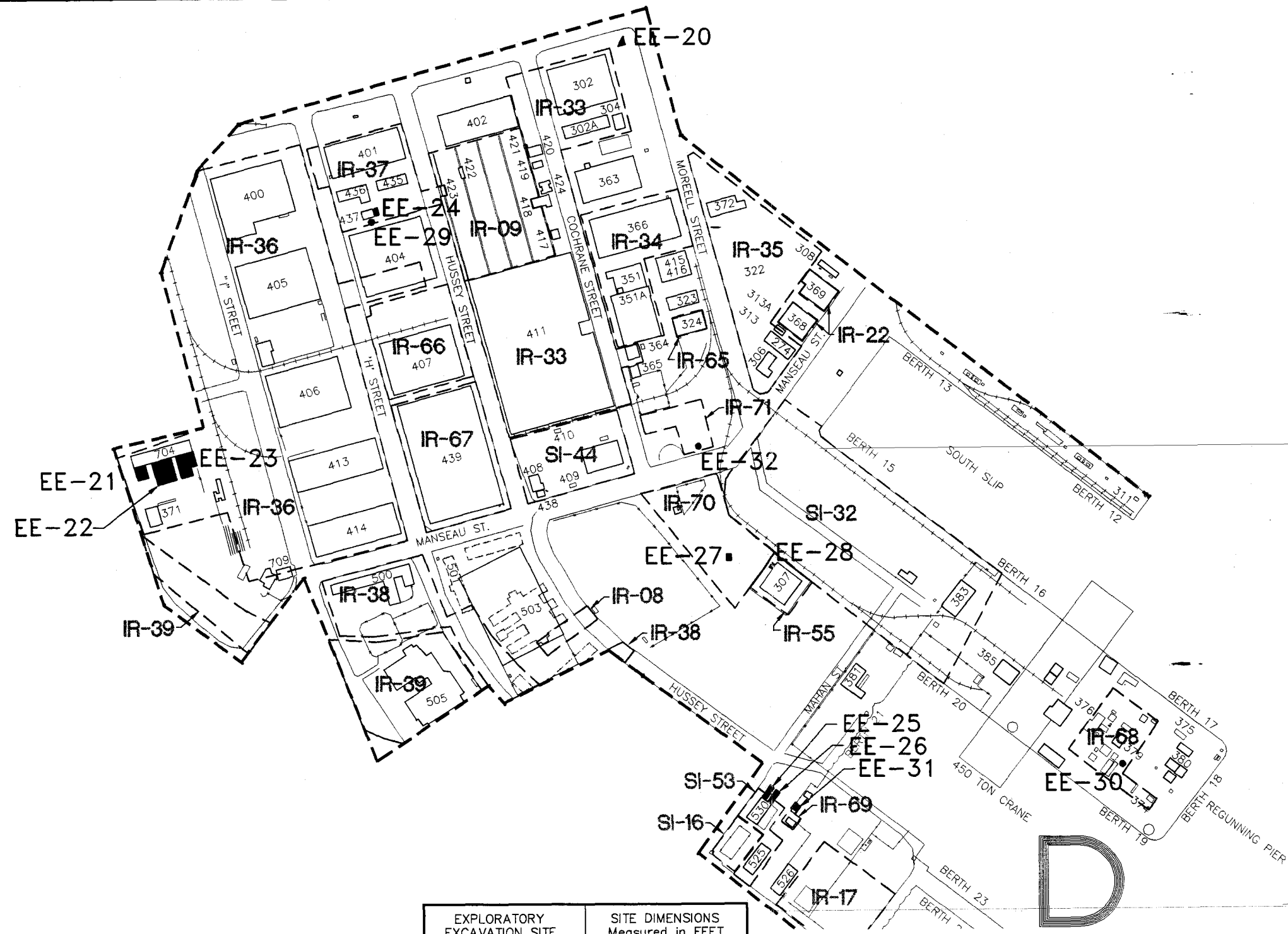
EXPLORATORY EXCAVATION SITE	SITE DIMENSIONS Measured in FEET
EE-08	10 X 10
EE-09	20 X 23
EE-10	16 X 36
EE-11	22 X 24
EE-12	25 X 25
EE-13	16 X 58
EE-14	25 X 30
EE-15	10 X 13
EE-16	16 X 30
EE-17	X
EE-18	X
EE-19	Scrapyard

150' 0 150' 300'
SCALE: 1"=300'

HUNTERS POINT ANNEX
SAN FRANCISCO, CALIFORNIA

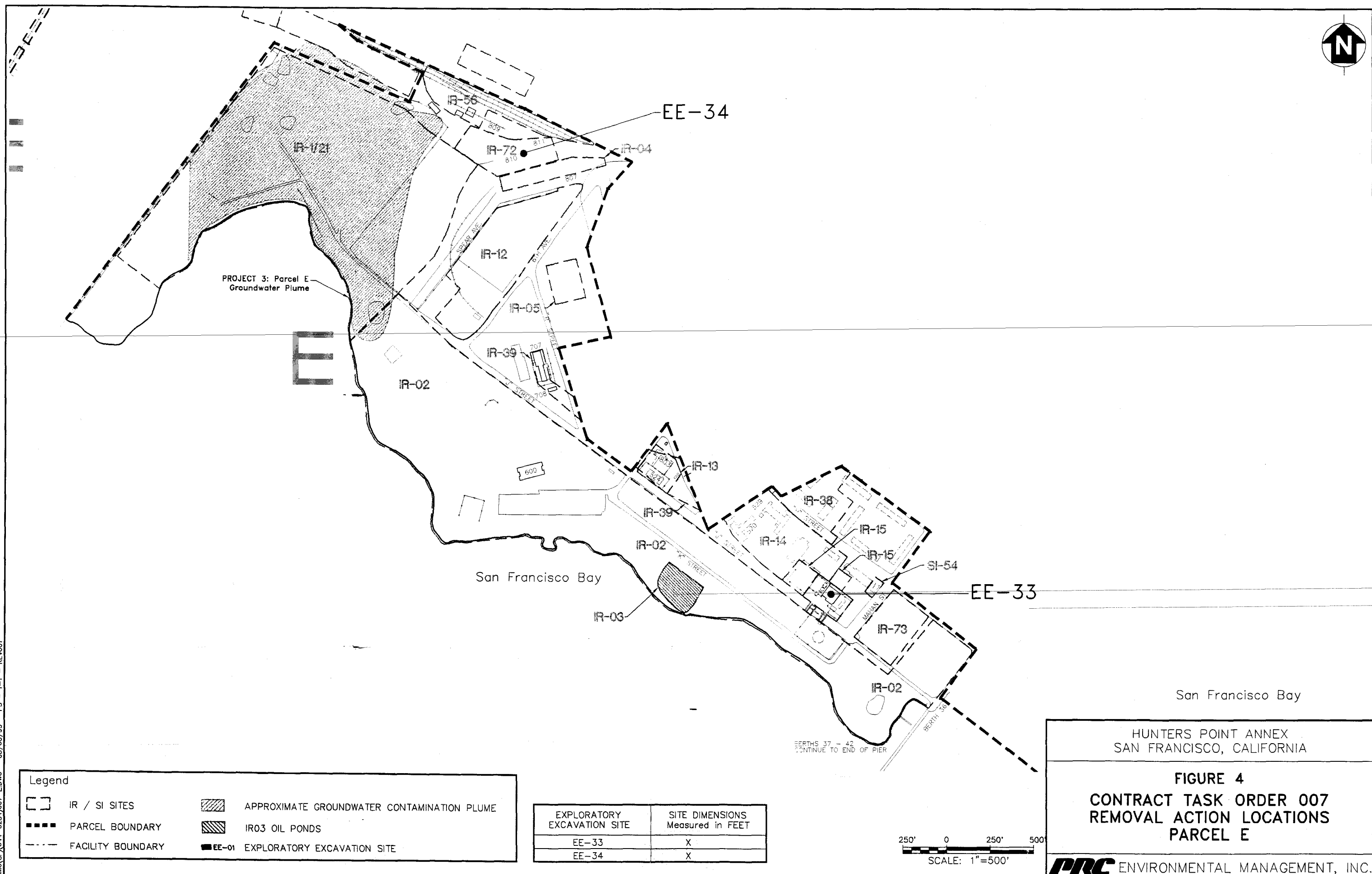
FIGURE 2
CONTRACT TASK ORDER 007
REMOVAL ACTION LOCATIONS
PARCEL C

PRC ENVIRONMENTAL MANAGEMENT, INC.



PRC ENVIRONMENTAL MANAGEMENT, INC.

MU(SF)(044-0287)007--D.DWG -- 08/10/95 -- PS -- 1=1 -- REV001



IMU(SF)(044-0254)007-E.DWG - 08/08/95 - PS - 1=1 -- REV001

EXPLORATORY EXCAVATION SITE	SITE DIMENSIONS Measured in FEET
EE-33	X
EE-34	X

HUNTERS POINT ANNEX
SAN FRANCISCO, CALIFORNIA

FIGURE 4
CONTRACT TASK ORDER 007
REMOVAL ACTION LOCATIONS
PARCEL E

PRC ENVIRONMENTAL MANAGEMENT, INC.